

1	dverfurth@gordonrees.com	
2	Neal J. Philip, WSBA No. 22350 nphilip@gordonrees.com	
3	GORDON & REES LLP 701 Fifth Avenue, Suite 2100	
4	Seattle, WA 98104	
5	Phone: (206) 695-5100 Fax: (206) 689-2822	
6	Attorneys for Defendant Unigard Insurance Con	npany
7		
8		
9	UNITED STATES D	ISTRICT COURT
10	FOR THE WESTERN DISTI AT SEA	
11	MARY KAY TAYLOR,	
12	Plaintiff,	NO.
13	V.	NOTICE OF REMOVAL
14		NOTICE OF REMOVILE
	UNIGARD INSURANCE COMPANY, a Washington Corporation,	
15	Defendant.	
16		
17	TO: THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON	
18		y, erroneously identified by plaintiffs as a
19	Washington corporation, hereby removes to this Court the state court action described below:	
20		
21	-	plaintiff Mary Kay Taylor commenced an
22	action in the Superior Court of Washington, King County, entitled Mary Kay Taylor v.	
23	Unigard Insurance Company, et al., Cause No. 14-2-25559-4 SEA.	
24		the Washington State Office of the Insurance
25	Commissioner on September 24, 2014.	
	I	

NOTICE OF REMOVAL - 1

GORDON & REES LLP

701 5th Avenue, Suite 2100 Seattle, WA 98104 Telephone: (206) 695-5100 Facsimile: (206) 689-2822

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1

- 3. Upon information and belief, Taylor is a citizen of a state other than Washington or Wisconsin.
- 4. Although plaintiff identifies Unigard as a Washington corporation, Unigard is in fact a Wisconsin corporation with its principal place of business in Wisconsin. Appendix A.
- 5. Taylor alleges in her Complaint that she is an insured under a UIM policy she purchased from Unigard and that Unigard wrongfully denied her UIM claim, thereby breaching the insurance contract in bad faith, among other claims.
- 6. Upon information and belief, and based upon her Complaint, Taylor is claiming damages in excess of \$75,000.
- 7. Removal is proper because plaintiff and defendant are citizens of different states and the amount in controversy exceeds \$75,000.
- 8. The exhibits attached hereto as Appendix B constitute all of the pleadings and filings in the King County Superior Court matter.

INTRADISTRICT ASSIGNMENT

9. Plaintiff is aware of no reason supporting reassignment of this case to the Tacoma Division.

DATED this 24th day of October, 2014.

GORDON & REES LLP

/s/Donald J. Verfurth
Donald J. Verfurth, WSBA No. 15554
dverfurth@gordonrees.com
Neal J. Philip, WSBA No. 22350
nphilip@gordonrees.com
GORDON & REES LLP
701 Fifth Avenue, Suite 2100
Seattle, WA 98104
Phone: (206) 695-5100
Attorneys for Defendant Unigard Insurance
Company

GORDON & REES LLP

701 5th Avenue, Suite 2100 Seattle, WA 98104 Telephone: (206) 695-5100 Facsimile: (206) 689-2822

1	<u>DECLARATION OF SERVICE</u>	
2	I hereby declare, under penalty of perjury under the laws of the State on Washington	
3	that on the 24 th day of October, 2014, I served a true and correct copy of the foregoing	
4	document on the following via email and U.S. mail, postage prepaid:	
5	Ashton K. Dennis, WSBA No. 44015 Washington Law Center, PLLC	
6	15 Oregon Avenue, Suite 210	
7	Facsimile: (253) 476-2298 Email: ashton@washingtonlawcenter.com Attorney for Plaintiff	
8		
9		
10	Lincoln C. Beauregard, WSBA No. 32878 Connelly Law Offices 2301 North 30 th Street	
11	Tacoma, WA 98403	
12	Telephone: (253) 593-5100 Fax: (253) 593-0380	
13	Email: lincolb@connelly-law.com Attorney for Plaintiff	
14	DATED this 24 th day of October, 2014.	
15		
16	/s/Jeanne Perrin	
17	Jeanne Perrin, Legal Secretary	
18		
19		
20		
21		
22		
23		
24		
25		

1100437/21121520v. | NOTICE OF REMOVAL - 3

GORDON & REES LLP 701 5th Avenue, Suite 2100 Seattle, WA 98104 Telephone: (206) 695-5100 Facsimile: (206) 689-2822